

HONORABLE BARBARA J. ROTHSTEIN
HONORABLE S. KATE VAUGHAN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MATT WRIGHT,

Plaintiff,

v.

STATE OF WASHINGTON, WASHINGTON
STATE DEPARTMENT OF CORRECTIONS,
CHRISTINE GOMES, TRACI DRAKE, DAVID
CHRISTENSEN, CAROL SMITH, LOUISE
STEMLER, JASON MARTIN, JASON RICHER,
ALEX COSTA, RISA KLEMME, NIKKI RYMER,
and DOES I-X inclusive,

Defendants.

Case No. C23-1326-BJR-SKV

**AGREED STIPULATION AND
(PROPOSED) ORDER
EXTENDING CASE SCHEDULE
DEADLINES**

Noted for Consideration:

August 27, 2024

I. STIPULATION

For good cause shown and pursuant to the Court's Order Extending the Case Scheduling
Deadlines, Dkt.10, all parties to this matter stipulate as follows:

1. The parties have been actively engaged in discovery in this matter, including exchange of
written interrogatories and request for production. The parties intend to engage in depositions of fact
witnesses and parties.

2. The current expert discovery deadline is September 20, 2024. Due to the breadth of
discovery sought and the need for reviewing and redacting records sought by the parties, the parties will

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Case No. C23-1326-BJR-SKV – 1

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1 need additional time to complete discovery. The parties anticipate that an additional three (3) months
 2 from the current deadline will be sufficient. The parties do not anticipate any further extensions of this
 3 Court's deadlines.

4 3. The parties agree that the purpose of this extension is to allow more time to review,
 5 redact, and produce responsive records sought by the parties. The parties agree that no further written
 6 discovery will be propounded after this Court's current discovery deadline of September 20, 2024.

7 3. Extending the discovery deadline will make it difficult to maintain the remaining dates on
 8 the case schedule order, including expert related motions and dispositive motions, as well the ability to
 9 evaluate the case for potential pretrial mediation. Therefore, the parties request that all remaining dates
 10 on the case schedule also be extended as follows:
 11

12 EVENT	CURRENT DEADLINE	NEW DEADLINE
13 Discovery Motions	August 26, 2024	November 26, 2024
14 Discovery Deadline	September 20, 2024	December 20, 2025
15 Dispositive Motions	October 21, 2024	January 21, 2025
16 Motions in Limine	February 12, 2025	May 12, 2025
17 Joint Pretrial Statement	February 19, 2025	May 19, 2025
18 Jury Trial	March 17, 2025	June 17, 2025

19 STIPULATED TO THIS 27th DAY OF August 2024.

20 LAW, LYMAN, DANIEL, KAMERRER
 21 & BOGDANOVICH, P.S.

22 */s/ John E. Justice*

23 John E. Justice, WSBA No. 23042
 24 Attorney for Defendants
 25 P.O. Box 11880, Olympia, WA 98508
 26

**AGREED STIPULATION AND ~~(PROPOSED)~~
 ORDER EXTENDING CASE SCHEDULE
 DEADLINES**

Case No. C23-1326-BJR-SKV – 2

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/s/ Darryl Parker

Darryl Parker, WSBA No. 30770

Attorney for Plaintiff

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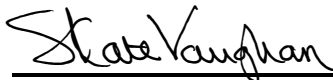
dparker@civilrightsjusticecenter.com

ORDER

Pursuant to the stipulation of the parties, and for good cause shown, the Case Schedule Order is modified as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Discovery Motions	August 26, 2024	November 26, 2024
Discovery Deadline	September 20, 2024	December 20, 2024
Dispositive Motions	October 21, 2024	January 21, 2025
Motions in Limine	February 12, 2025	May 7, 2025
Joint Pretrial Statement	February 19, 2025	May 19, 2025
Pretrial Conference	March 4, 2025 at 10:30 am	June 3, 2025 at 10:30 am
Jury Trial	March 17, 2025	June 16, 2025

DONE THIS 28th DAY OF August, 2024



S. KATE VAUGHAN

United States Magistrate Judge

**AGREED STIPULATION AND ~~(PROPOSED)~~
ORDER EXTENDING CASE SCHEDULE
DEADLINES**

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CERTIFICATE OF FILING AND SERVICE

I hereby certify under penalty of perjury under the laws of the United States of America that on this date, I caused to be electronically filed the foregoing document, and this Certificate of Filing & Service with the CM/ECF e-filing portal which will cause the same to be served on the following:

Plaintiffs Attorney:

Darryl Parker
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dparker@civilrightsjusticecenter.com

DATED this 27th day of August, 2024 at Tumwater, WA.

/s/ Lisa Gates

Lisa Gates, Legal Assistant

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